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June 30, 2014

RAYMOND A. BRAGAR

By Federal Express

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The Honorable Jed S. Rakoff
United States Courthouse
500 Pearl St.
New York, N.Y. 10007-1312

7/1/14

Re: *I. Stephen Rabin v. The NY Times Co., et al. 14 civ. 4498 (JSR)*

Dear Judge Rakoff:

We represent plaintiff in this matter. I write pursuant to your Notice of Conference dated June 27, 2014. First, as requested, I enclose a courtesy copy of the complaint. Second, I request an adjournment of the initial conference now scheduled for July 10, 2014. The complaint was filed last week on June 23, 2014 and has not yet been served. Considering that the defendants are substantial corporations who will need to select counsel, a conference within 10 days does not give us sufficient time to meet and come up with a discovery plan within 7 days of the conference or July 3rd. I, therefore, respectfully request an adjournment of the conference until August to permit us time to serve defendants, meet with counsel and comply with Your Honor's directives.

Respectfully submitted,

Raymond A. Bragar
Raymond A. Bragar

cc: (by email)
David E. McCraw, Esq.

7/1/14

*plaintiff's
There is no reason why counsel can't easily
serve the defendants, and they in turn know
how to obtain counsel promptly. Accordingly,
the application is hereby DENIED.*

SO ORDERED

Jed S. Rakoff
USDS

Endorsement on 14cv4498 plaintiff MEL 7-1-2014

There is no reason why plaintiff's counsel can't easily serve the defendants, and they in turn know how to obtain counsel promptly. Accordingly, the application is hereby DENIED.